

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

CHARLESTON DIVISION

**In Re Ethicon, Inc., Pelvic Repair System Products Liability
Litigation**

MDL No. 2327

THIS DOCUMENT RELATES TO ALL CASES

APPLICATION FOR APPOINTMENT OF JAYNE CONROY

TO SERVE ON PLAINTIFFS' STEERING COMMITTEE

NOW COMES Jayne Conroy who respectfully files this application for appointment to Plaintiffs' Steering Committee ("PSC"). I am most willing and able to commit myself and my firm, our extensive experience and our resources to this litigation. My firm and I have worked cooperatively with dozens of law firms in several multi-district litigations and our clients have found justice in the process. I have reviewed the Plaintiffs' Proposed Counsel Organizational Structure Plan filed with this Court for MDL 2325, 2326, and 2327 on March 19, 2012. I join in support of the recommendations made in that filing to this Honorable Court.

I am a founding member of Hanly Conroy Bierstein Sheridan Fisher & Hayes, LLP, located in New York City. I have been a trial lawyer involved in mass tort litigation for almost three decades. My partners, associates and staff are all dedicated to the representation of plaintiffs in pharmaceutical, device and product defect litigation. My firm has filed cases in this MDL and we are currently researching the claims of hundreds of women who have suffered as a result of implanted transvaginal surgical mesh products. I have been personally involved in interviewing potential clients, research of their attendant medical conditions, as well as the

scientific and legal issues involved in this significant and nationwide litigation. My firm and I look forward to representing these women to the best of our abilities in this litigation.

By way of background, I graduated from Dartmouth College in 1980 and New England School of Law in Boston in 1985. I am a member in good standing of the state and federal bars of Massachusetts (1985), New York (1996) and the District of Columbia (1996). I have been involved in the leadership of several MDLs and I list below my former as well as current appointments:

- ***In Re: Zyprexa Products Liability Litigation***, (E.D.N.Y.) (PSC member, resolved 2007);
- ***In Re: Bextra and Celebrex Marketing and Sales Practices and Products Liability Litigation***, (N.D. Cal.) (State/Federal Liaison, Trial Counsel, Fee Committee Member, resolved 2009);
- ***In Re: Gadolinium-Based Contrast Agents Products Liability Litigation***, (N.D. Ohio) (PSC member, resolved 2010);
- ***In Re: Chantix (Varenicline) Products Liability Litigation***, (N.D. Ala.)(State/Federal Liaison, 2009 – present);
- ***In Re: Yasmin and Yaz (Drospirenone) Marketing, Sales Practices and Products Liability Litigation***, (S.D. Ill.)(Co-Chair Law and Briefing Committee, 2009 – present; in resolution);
- ***In Re: Toyota Motor Corp. Unintended Acceleration Marketing, sales Practices and Products Liability Litigation***, (S.D. Cal.) (Member, Economic Loss Committee, 2010 - present);
- ***In Re: Oil Spill by the Oil Rig "Deepwater Horizon" in the Gulf of Mexico, on April 20, 2010***, (E.D. La.) (Science Committee member, 2010 – present);
- ***In Re: DePuy, Inc. ASR Hip Implant Products***, (S.D. Ohio)(PSC member, 2011 – present);
- ***In Re: DePuy Orthopaedics, Inc. Pinnacle Hip Implant Products Liability Litigation***, (N.D. Tex.) (PEC Member, 2012 – present).

Although my office is in New York, the nature of my practice over the last twenty-five years has required me to travel extensively for status conferences, depositions, trial proceedings and meetings/negotiations. The location of this MDL will not be a hardship. In addition, I am in a position to commit substantial time to these proceedings. Although I am involved in other pending MDLs, I serve with many other very experienced lawyers, including my law partners, on these committees. We are assigned specific tasks based on our expertise. This designation of duties as well as the various litigation stages of each MDL (discovery, trial, settlement) allows me to efficiently manage my time.

As the Court can see from my prior appointments, I am very experienced in all aspects of multi-district litigation, and my continued appointment to positions of leadership is, I believe, a testament to my ability to work well with others. While I occasionally had to learn the hard way how not to do things, my clients have been well-served by my representation, and I can now navigate efficiently and effectively through the complexities and surprises of multi-district litigation.

Dated: New York, New York
March 30, 2012

Respectfully Submitted,

HANLY CONROY BIERSTEIN SHERIDAN
FISHER & HAYES, LL

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CERTIFICATE OF SERVICE

I hereby certify that on March 30, 2012, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

By: /s/ Jayne Conroy
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